

FILED IN OPEN COURT

JAN 24 2024

CHRISTOPHER EKMAN
CLERK

CJB

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

*

CRIM. NO. *2:24-3-JB*

*

USAO NO. 23R00488

*

v.

*

VIOLATION: 21 U.S.C. § 843(a)(3)

*

SUSAN SPEED

INDICTMENT

THE GRAND JURY CHARGES:

COUNTS ONE THROUGH TWELVE

1. From on or about February 15, 2018, through on or about March 15, 2023, **SUSAN SPEED** was employed as a licensed pharmacist at a pharmacy whose identity is known to the Grand Jury and is identified herein as Pharmacy–A located in Demopolis, Alabama. During this period, Pharmacy–A possessed a DEA license, which authorized **SPEED** to fill valid prescriptions containing Schedule II–V controlled substances. Accordingly, **SPEED** was authorized to fill valid prescriptions for promethazine–codeine syrup, a Schedule V controlled substance.

2. On or about January 30, 2018, a doctor whose identity is known to the Grand Jury and is identified herein as Doctor–A issued a valid prescription to **SPEED** for promethazine 6.25 mg–codeine 10 mg/5 mL syrup. Doctor–A noted on the prescription that two additional refills of this same drug were permitted.

3. After receiving this initial prescription and the two permitted refills, **SPEED** filled additional prescriptions for promethazine–codeine syrup for herself at Pharmacy–A. Each time she filled the prescription for herself, **SPEED** indicated that it had been prescribed to her by Doctor–A. However, Doctor–A did not write these promethazine–codeine syrup prescriptions.

4. Between on or about February 23, 2018, and continuing through on or about March 8, 2023, including on or about the specific dates listed in the chart below, in the Southern District of Alabama, the defendant,

SUSAN SPEED,

knowingly and intentionally obtained promethazine–codeine syrup, a Schedule V controlled substance, by misrepresentation, fraud, forgery, deception, and subterfuge, to wit: by filling for herself at Pharmacy–A prescriptions supposedly written by Doctor–A.

5. **SPEED** obtained promethazine–codeine syrup in this manner on nearly 200 separate occasions, including as follows:


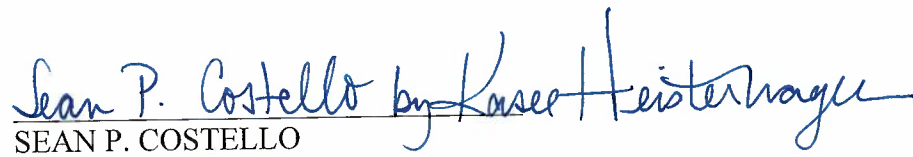
Count	Date Filled	Filled By	Filled For	Controlled Substance
One	02/23/18	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Two	10/12/18	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Three	01/14/19	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Four	11/04/19	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Five	02/24/20	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Six	12/30/20	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Seven	01/27/21	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Eight	12/01/21	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Nine	01/31/22	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Ten	11/14/22	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Eleven	01/02/23	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup
Twelve	03/08/23	SUSAN SPEED	SUSAN SPEED	promethazine–codeine syrup

6. All in violation of Title 21, United States Code, Section 843(a)(3).

A TRUE BILL

FOREPERSON UNITED STATES GRAND JURY
SOUTHERN DISTRICT OF ALABAMA

SEAN P. COSTELLO
UNITED STATES ATTORNEY
By:


CHRISTOPHER J. BODNAR
Assistant United States Attorney
SEAN P. COSTELLO
United States Attorney

JANUARY 2024